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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In the Matter of )  
 )  
Revision of the Commission's ) CC Docket No. 94-102  
Rules to Ensure Compatibility )  
with Enhanced 911 Emergency )  
Calling Systems )

REPLY COMMENTS OF  
THE CELLULAR TELECOMMUNICATIONS INDUSTRY ASSOCIATION

The Cellular Telecommunications Industry Association ("CTIA")<sup>1</sup> hereby submits reply comments in the above-captioned proceeding. As CTIA's January 9, 1995 Comments set forth in greater detail, the wireless industry supports the Commission's goals and is willing to undertake the efforts required to implement broader access to enhanced 911 ("E911") services.

The Comments in this proceeding make clear the risks of acting in advance of the establishment of a common technological capability that can become the standard for the nation's PSAPs and wireless carriers. The steps toward the

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<sup>1</sup> CTIA is the international organization of the wireless communications industry for both wireless carriers and manufacturers. Membership in the association covers all Commercial Mobile Radio Service providers, including cellular, personal communications services, enhanced specialized mobile radio, and mobile satellite services.

end result must be economically and technically rational, which will not be possible until there is uniform understanding of the technological capabilities and protocols now being developed. Accordingly, CTIA urges the Commission to establish an Industry Advisory Committee to devise a consensual solution that will best meet the needs of public safety officials and wireless customers and carriers for implementation of E911 services on an economically and technically sound basis.

It is evident from the record that there are a number of promising technologies; yet no one has yet demonstrated the ability to meet the Commission's phase three requirements for providing the PSAP with detailed location information in three dimensions (latitude, longitude, and elevation) in both rural and urban environments within a radius of no more than 125 meters within five years of the effective date of an order adopting the rules in this proceeding.

The inability to specify how phase three will be implemented directly affects the Commission's proposals to implement phase one (identification of user location by cell site or base station location and the provision of ALI to the PSAP within one year of the adoption of the rules) and phase two (provision of an estimate of the direction and distance of the mobile unit from the cell site within three years of the adoption of rules). If the steps used to implement phase one

and/or phase two ultimately are incompatible with the systems needed to implement phase three, the Notice's schedule would require substantial investment on the part of the carriers and PSAPs that almost immediately would be rendered obsolete.

In short, the path taken towards achieving the Notice's phase three capabilities should be as economically efficient and rational as possible. By failing to provide a logical evolutionary path to the desired end, there is a very real risk that the investment required to deploy phases one and two will deter and delay the full and timely deployment of superior technologies and capabilities.

CTIA's comments also addressed and supported the Commission's efforts to provide all wireless subscribers with access to emergency services such as 911.<sup>2</sup> Such access should be available to both home and roaming customers who dial 911, as is generally the case in cellular systems in locations

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<sup>2</sup> CTIA noted, however, that the Commission is correct to recognize that availability must be tied to the activated status of the mobile phone -- otherwise the phone will not have a MIN (Mobile Identification Number) associated with it, and thus will lack a phone number. This would preclude such features as ANI and call-back, and risk frivolous use of 911 services. See CTIA Comments at 12.

which have 911 service.<sup>3</sup> CTIA would support the establishment of a rule that requires all wireless carriers to provide their subscribers with access to 911 service.

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<sup>3</sup> As CTIA noted in its Comments, cellular switches are generally programmed to complete 911 calls without screening, so both home and roaming customers who dial 911 are routed automatically to a PSAP. See CTIA Comments at 13. CTIA subsequently has learned, however, that a few cellular systems may restrict unvalidated roaming customers' access to 911 service. Thus, while 911 service generally is available to a roaming customer even when the customer's access to the visited system may otherwise be restricted, CTIA erred in asserting that access to 911 service is always available. *Id.*, at n.15.

In conclusion, CTIA welcomes and supports the Commission's objectives in this proceeding which seek to bring about the wide deployment of improved access to emergency services for wireless customers. We urge the Commission to promptly initiate a "Wireless E911 Advisory Committee" as the optimal means of securing these objectives. In addition, CTIA believes that all wireless carriers should provide their subscribers with access to 911 emergency services.

Respectfully Submitted,  
Cellular Telecommunications  
Industry Association



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March 17, 1995

## **CERTIFICATE OF SERVICE**

I, Robert F. Roche, hereby certify that on this 17th day of March, 1995, copies of the foregoing Reply Comments of the Cellular Telecommunications Industry Association were served by hand delivery upon the following parties:

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